

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709
CHRISTIAN R. RUIZ
Assistant United States Attorney
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Fax: (702) 388-6787
Christian.Ruiz@usdoj.gov

Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

State Farm Mutual Automobile Insurance
Company,

Plaintiff,

v.

United States of America,

Defendant.

Case No. 2:24-cv-00762-JCM-DJA

**Joint Stipulation to Stay the
Proceedings Pending Settlement
Discussions (Second Request)**

Plaintiff State Farm Mutual Automobile Insurance Company and Defendant the United States of America hereby stipulate and jointly move the Court to stay all deadlines in this matter and hold this case in abeyance for a period of 60 days, or until December 7, 2024. The parties have conferred, and they believe they will be able to resolve this matter without continued litigation. The parties have reached an informal, verbal agreement regarding a settlement, and the undersigned attorney for the United States is currently seeking the requisite authority to finalize a settlement under the pertinent policies in place at the United States Attorney's Office in Nevada.

This is the second request to stay the proceedings. The parties submit this request neither for the purpose of delay nor to cause undue prejudice to any party nor for any other improper purpose. The parties submit this request to facilitate the parties' efforts to resolve the matter in a "just, speedy, and inexpensive" manner consistent with Fed. R. Civ. P. 1.

1 The parties reserve the ability to seek additional time to finalize resolution, if
2 necessary, but anticipate they will be able to file dismissal paperwork prior to the
3 identified deadline.

4 Respectfully submitted this 8th day of October 2024.

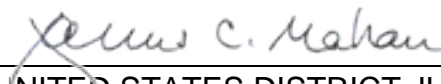
5
6 CLERKIN, SINCLAIR &
7 MAHFOUZ, LLP

JASON M. FRIERSON
United States Attorney

8 /s/ Richard L. Mahfouz II
9 RICHARD L. MAHFOUZ II
10 Nevada Bar No. 15431
7251 W. Lake Mead Blvd., Suite 300
Las Vegas, Nevada 89128
11 *Attorney for Plaintiff State Farm Mutual
Automobile Insurance Company*

/s/ Christian R. Ruiz
CHRISTIAN R. RUIZ
Assistant United States Attorney
Attorneys for the United States

12
13 **IT IS SO ORDERED:**

14
15
16 
17 UNITED STATES DISTRICT JUDGE

18
19 **DATED:** October 9, 2024
20
21
22
23
24
25
26
27
28